

Message

From: Bacey, Juanita@DTSC [Juanita.Bacey@dtsc.ca.gov]
Sent: 3/11/2016 12:56:12 AM
To: LEE, LILY [LEE.LILY@EPA.GOV]
Subject: RE: Do you want to request this further detail from the Navy? RE: Re previous comment -

Ok, also, maybe we can talk tomorrow (via cell) about 2 issues that came up in the BCT meeting: Parcel C SVE issues that may start to resemble IR-10 issues and, the Parcel E-2 samples that need to be collected on the other side of the fence. Sounds like Derek is already working on his defense.

From: LEE, LILY [mailto:LEE.LILY@EPA.GOV]
Sent: Thursday, March 10, 2016 4:53 PM
To: Bacey, Juanita@DTSC
Subject: RE: Do you want to request this further detail from the Navy? RE: Re previous comment -

Dear Nina,

Thank you, I didn't want to steal your thunder if you wanted to be the one who makes the comment. But since you don't mind, I'll go ahead and do it.

Lily Lee
Cleanup Project Manager
Superfund Division
U.S. Environmental Protection Agency, Region 9
75 Hawthorne St. (SFD-8-3)
San Francisco, CA 94105
Tel: 415-947-4187, Fax: 415-947-3518
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From: Bacey, Juanita@DTSC [mailto:Juanita.Bacey@dtsc.ca.gov]
Sent: Tuesday, March 08, 2016 5:31 PM
To: LEE, LILY <LEE.LILY@EPA.GOV>
Subject: RE: Do you want to request this further detail from the Navy? RE: Re previous comment -

Hi Lily,

Have you already responded to Derek's email from 2/19 (below - RAD RACR Addendum) If not, I would try to answer his questions(below) and, I think his statement is missing the point:

You asked for a statement by the Navy committing to accurate reporting of average scan rate for all work reported in the future. This is an easy enough statement to add, but I want to better understand your purpose for asking for this statement? Is it for the public's peace of mind? Would it help to include the information of how the Navy's quality control review identified the issue and the steps we have taken to catch problems earlier in the future?

His solution was to add the following statement to the RTCs:

"The Navy continues to be committed to accurately reporting any and all activities (including scan rates) completed on our sites. This commitment led to Navy quality control discovering the inaccurate reporting and indicates that oversight is being performed at a high level. Regardless, to accelerate identification of problems and potentially prevent them before they happen in the future, the Navy hired a firm to provide increased fieldwork oversight and review procedures for all radiological work conducted at Hunters Point."

My Response: Derek, the regulatory agencies greatly appreciate the hiring of the QC contractor to ensure accurate fieldwork process and reporting. In addition, we would like a commitment from the Navy to provide improved oversight over all of their contractors.

Just a thought, but not required. You're lucky you got the first comment out of him. ;-)

Nina

-----Original Message-----

From: LEE, LILY [mailto:LEE.LILY@EPA.GOV]

Sent: Monday, March 07, 2016 3:06 PM

To: Bacey, Juanita@DTSC

Subject: Do you want to request this further detail from the Navy? RE: Re previous comment -

Lily Lee

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-----Original Message-----

From: Bacey, Juanita@DTSC [mailto:Juanita.Bacey@dtsc.ca.gov]

Sent: Wednesday, February 24, 2016 5:22 PM

To: LEE, LILY <LEE.LILY@EPA.GOV>

Subject: RE: Re previous comment -

The hiring of the QC contractor is the most important factor. The statement should include this plus the fact that the Navy will make every attempt to improve their own QC. Yes, they discovered the problem with the rescan, or was it that the contractor discovered it and brought it to their attention? As was included in our list of "issues" that we presented at a BCT meeting, sloppy completion of field forms from scans was not caught by the contractor or Navy staff. Or did the Navy catch it and allow it to be submitted to us because of their deadlines? I expect with the new 3rd party QC contractor, these issues will be addressed, but only time will tell. CDPH EMB and RHB already indicated to me their approval of the new QC contractor. They are familiar with them and trust them. The Navy should commit to improved oversight and ensure corrections of errors in docs before they are presented in draft form to regulatory agencies. Other than that, I think it should be fine.

Now, can you get them to respond to my comments on the last ground water monitoring report that I sent them in November? I know we're working on the well network, but that doesn't address all of my other comments. ;-)

From: LEE, LILY [LEE.LILY@EPA.GOV]

Sent: Wednesday, February 24, 2016 2:45 PM

To: Bacey, Juanita@DTSC

Subject: FW: Re previous comment - FW: EPA Comments on draft Rad RACR Addendum Parcels B & G dated Nov 2014

Do you think this level of detail is sufficient?

Lily Lee

Cleanup Project Manager

Superfund Division

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-----Original Message-----

From: Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [mailto:derek.j.robinson1@navy.mil]
Sent: Friday, February 19, 2016 10:35 AM
To: LEE, LILY <LEE.LILY@EPA.GOV>
Cc: Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Janda, Danielle L CIV NAVFAC SW <danielle.janda@navy.mil>
Subject: RE: Re previous comment - FW: EPA Comments on draft Rad RACR Addendum Parcels B & G dated Nov 2014

Hi Lily,

As evident from the Navy's quality control procedures identifying the scan rate problem, we are definitely committed to making sure that the contractor accurately reports their scan rate. Subsequent to this incident, we put in place the RAD QC contractor to ensure that radiological work has even more surveillance, so that these types of issues can be caught early.

You asked for a statement by the Navy committing to accurate reporting of average scan rate for all work reported in the future. This is an easy enough statement to add, but I want to better understand your purpose for asking for this statement? Is it for the public's peace of mind? Would it help to include the information of how the Navy's quality control review identified the issue and the steps we have taken to catch problems earlier in the future?

Contractors/people will always make mistakes. Usually, the Navy or our contractor identifies mistakes before the information is reported and we have the contractor redo their work. Occasionally, the issues will make it into our documents before they are caught. The Navy can commit to the increased oversight that we have put in place -and- to our commitment to continued quality control. I assume that you aren't asking for some sort of guarantee.

How does this sound? I can include it in the RTCs.

"The Navy continues to be committed to accurately reporting any and all activities (including scan rates) completed on our sites. This commitment led to Navy quality control discovering the inaccurate reporting and indicates that oversight is being performed at a high level. Regardless, to accelerate identification of problems and potentially prevent them before they happen in the future, the Navy hired a firm to provide increased fieldwork oversight and review procedures for all radiological work conducted at Hunters Point."

Thanks,

Derek

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